

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

NHC LLC,)
Plaintiff,)
)
v.) Case No. 2019 C 6332
)
CENTAUR CONSTRUCTION COMPANY, *et al.*,) Judge Matthew Kennelly
)
Defendants.)

**PLAINTIFF/JUDGMENT CREDITOR'S MOTION TO COMPEL AETNA HEALTH
MANAGEMENT, LLC'S COMPLIANCE WITH A LAWFULLY SERVED SUBPOENA**

Plaintiff/Judgment Creditor NHC LLC (“NHC”), by its undersigned counsel and pursuant to Federal Rule of Civil Procedure 45, and for its Motion to Compel Compliance with a Lawfully Served Subpoena and to Find Aetna Health Management, LLC (“Aetna”) in Contempt of Court (the “Motion”) states as follows:

1. A validly issued Subpoena to Produce Documents (the “Subpoena”) was issued to Aetna via its Registered Agent, CT Corporation System, 208 So. LaSalle Street, Suite 814, Chicago, Illinois 60604, on or about April 3, 2025. Attached hereto as **Exhibit A** is a true and correct copy of the Subpoena and attached hereto as **Exhibit B** is a true and correct copy of the Affidavit of Special Process Server.
2. The Subpoena had a return date of April 21, 2025. (Ex. A.)
3. As of April 21, 2025, counsel for NHC had not received any response to the Subpoena from Aetna.

4. In a good faith attempt to avoid seeking intervention from this Court, on April 22, 2025, counsel for NHC sent correspondence to Aetna demanding that Aetna comply with the Subpoena by April 29, 2025. *See Exhibit C.*¹

5. As of the date of filing of this Motion, Aetna has not served any response, objection, or documents responsive to the Subpoena, nor has Aetna or its counsel made contact with counsel for NHC to provide an adequate excuse for its noncompliance with its Subpoena obligations.

WHEREFORE, Plaintiff/Judgment Creditor NHC LLC prays for an order compelling Aetna Health Management, LLC to comply with the Subpoena within seven (7) days or be found in contempt of court pursuant to FRCP 45(g). Plaintiff/Judgment Creditor NHC LLC further requests that Aetna pay attorneys' fees and costs related to the enforcement of the Subpoena.

¹ Enclosure omitted.

Dated: May 30, 2025

Respectfully submitted,

NHC LLC

By: /s/ Zachary J. Watters

One of Its Attorneys

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CERTIFICATE OF SERVICE

I hereby certify that, on May 30, 2025, a true and correct copy of the foregoing **PLAINTIFF/JUDGMENT CREDITOR'S MOTION TO COMPEL AETNA HEALTH MANAGEMENT, LLC'S COMPLIANCE WITH A LAWFULLY SERVED SUBPOENA** was electronically filed with the Clerk of the Court using the Court's CM/ECF system and thereby served electronically by the CM/ECF system on all counsel of record. I further certify that on May 30, 2025, I sent a true and correct copy of the foregoing via U.S. Mail to:

Aetna Health Management, LLC
c/o CT Corporation System
208 So. LaSalle Street, Suite 814
Chicago, IL 60604

/s/ Zachary J. Watters
An Attorney for NHC LLC